October 19, 2026

SUBMITTED VIA CFTC PORTAL

Secretary of the Commission
Office of the Secretariat
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: KalshiEX LLC – Temporary Perpetual Fee Rebate Program Update

Dear Sir or Madam,

KalshiEX LLC ("Kalshi" or "Exchange") hereby notifies the Commodity Futures Trading Commission ("CFTC") that, pursuant to Kalshi Rule 3.13(f), Section 5c(c) of the Commodity Exchange Act (the "Act"), and Section 40.6(a) of the regulations of the CFTC, it is implementing on or after October 30, 2026, an update to its Temporary Perpetual Fee Rebate Program ("Program") as set forth in Appendix A.

Kalshi is making the following amendments to the Program to clarify provisions of Section 4 regarding the scope of Eligible Markets, and to adjust the fee rebate percentage to 98% on all net taker fees and include additional Perpetuals categories as Eligible Markets. This update will go into effect upon exchange notice, which shall be no earlier than ten (10) business days following the self-certification filing date and will remain in effect until the earlier of December 31, 2026, or a date on which Kalshi amends or terminates the Program. Appendices A and B contain the Program's terms in redlined and clean form.

Kalshi Rule 3.13(f) allows Kalshi to create and administer programs that provide incentives to Participants that encourage trading, and the Program is consistent with this Rule. The purpose of the Program is to promote the adoption of Perpetual Futures Contracts by Self-Clearing Members of the Exchange through a Rebate structure, which is expected to drive volume and liquidity and promote more efficient markets to the benefit of all participants in the marketplace.

Kalshi has concluded that the Program, and the amendment thereto, is not inconsistent with the CEA and the CFTC's regulations. The following core principles most directly pertain to the Program:

Core Principle 2 - Compliance with Rules. The Program does not create an incomparable or discriminatory fee structure. The eligibility criteria for the Program are set forth in Appendix A, and are non-discriminatory and designed to encourage participation in the Program amongst Kalshi's members. All Eligible Participants are subject to the same terms and conditions as set forth in Appendix A.

Core Principle 3 - Contracts not Readily Susceptible to Manipulation. Kalshi has evaluated the Program's structure and terms against potential abusive-trading risks and believes the Program's design does not render the Exchange's perpetuals contracts readily susceptible to manipulation. Indeed, Kalshi believes the Program will support the relevant perpetual contracts' resistance to manipulation by enhancing participation and therefore liquidity in such contracts, making it more difficult for a bad actor to create an artificial price. The effect of this Program is to provide a trading fee holiday for Self-Clearing Members executing bona fide transactions in Kalshi's perpetual contract markets, which is expected to generate greater participation and liquidity in Kalshi's recently launched perpetuals markets. The Program's structure was designed with the intent to mitigate the risk of excess manipulation, fraud, or abuse in connection with the Program, in Kalshi's perpetual contracts. The Rebates available under this Program, including the potential application of per-trade incentives received under other Exchange trading incentive programs, shall be strictly limited to the value of fees paid per transaction. Furthermore, Kalshi's exclusion of fees paid on transactions resulting from, or subject to inquiry or investigation for potential, self-matching, wash trading, pre-arranged trading, or any other abusive trading practices set forth in Rule 5.17, as well fees paid on transactions cancelled or price-adjusted in accordance with Kalshi Rule 5.11, is intended to discourage activity without a corresponding bona fide purpose. This Rebate structure was designed to deter excess risk of non-bona fide trading activity in Kalshi's perpetual contract markets. Accordingly, Kalshi does not believe the Program's structure creates excess risk of manipulation, fraud, or abuse. Kalshi Rule 5.17's prohibition on trading abuses apply to all transactions regardless of Program participation. Should the Exchange detect evidence of market manipulation or other market abuses in markets incentivized by this Program in the future, the Exchange will perform an evaluation of the Program terms and incentives, along with an investigation of the abusive behavior, and if the Exchange determines that the Program is no longer consistent with its goals or the Rules of the Exchange, may take action including but not limited to, terminating the Program, terminating a Program participant's eligibility for incentives, or pursuing disciplinary action and rule enforcement under Chapter 9 of Kalshi's Rulebook.

Core Principle 4 - Prevention of Market Disruption; Core Principle 12 - Protection of Markets and Market Participants. The Program elements identified under Kalshi's Core Principle 3 analysis were also designed with the intention of preventing market disruptions across all perpetuals contract markets that are eligible for incentives under this Program. The operation of the Program does not impact Kalshi's ability to perform its trade practice and market surveillance obligations under the CEA. Chapter 5 of Kalshi's Rulebook includes prohibitions against fraudulent, non-competitive, unfair or abusive practices, such as self-matching, wash trading, or pre-arranged trading, all of which apply to trading activity eligible for Rebates under the Program. Kalshi maintains an independent surveillance and enforcement program dedicated to detecting and enforcing Chapter 5 of Kalshi's Rulebook. Kalshi staff will continue to monitor for manipulative trading, market abuse, and in particular, self-matching, wash trading, and pre-arranged trading, with a heightened focus on perpetuals contracts across all subcategories eligible for incentives and associated activities in the central limit orderbooks by all participants eligible for incentives under this Program.

Core Principle 7 - Availability of General Information. The Program is public and accurate, and available to all participants. The effective terms of the Program will be posted on the Exchange's website and publicly available.

Core Principle 9 - Execution of Transactions. The Program does not impact the Exchange's order execution. Accordingly, the Program does not alter the order matching engine, trade execution protocols, or priority of orders on the central limit order book.

Core Principle 16 - Conflicts of Interests. To minimize the potential for conflicts of interest, Kalshi is excluding any affiliate of Kalshi from becoming an Eligible Participant under the Program.

Core Principle 18 - Recordkeeping. Kalshi's systems will continue to track Program participants' volume to ensure proper implementation of the Program Rebates. Kalshi will maintain records of all trades and Rebates under the Program consistent with CFTC recordkeeping requirements.

Core Principle 19 - Antitrust Considerations. The Program terms do not create an unreasonable restraint of trade or impose any material anticompetitive burden on trading on the contract market. The Program is voluntary, open to all Eligible Participants on a non-discriminatory basis, and does not restrict any participant's ability to trade on the Exchange or on any other marketplace.

Core Principle 21 - Financial Resources. The Rebate amounts are capped at the value of fees already collected by the Exchange. The Program does not impair the Exchange's financial resources or its ability to satisfy its financial resources requirements.

No opposing views to the contrary have been expressed.

Kalshi accordingly certifies that the program complies with the requirements of the Commodity Exchange Act and the rules and regulations promulgated thereunder, and certifies that, concurrent with this filing, a copy of this submission was posted on the Kalshi website and may be accessed at: https://kalshi.com/regulatory/notices. If you have any questions or comments or require further information, please do not hesitate to contact me.

Sincerely,
Rhianna Ross
Regulatory Counsel
KalshiEX LLC
rross@kalshi.com

Enclosure:
Appendix A (Terms and Conditions) (tracked)
Appendix B (Terms and Conditions) (clean)

Appendix A
Temporary Perpetual Fee Rebate Program ("Program")
Terms and Conditions (Tracked)

1. Program Purpose

The purpose of this Program is to promote the adoption of Perpetual Futures Contracts ("Perps") by Self-Clearing Members ("SCMs") of the Exchange, by promoting volume and liquidity. The promotion of additional liquidity and increased price competition drives more efficient markets and benefits all participants in the marketplace.

2. Program Scope and Duration

The Program applies to all Perps markets on the Exchange, including Perps referencing cryptocurrencies, metals, ~~and~~ indices, energy, FX, and securities ("Eligible Markets").

The Program will be effective upon Exchange notice, but not earlier than 5:00 PM ET on October 30~~21~~, 2026, and continue until the earlier of December 31, 2026, or the date that Kalshi amends or terminates the Program.

3. Eligible Participants

"Eligible Participants" are all Self-Clearing Members of Kalshi.

4. Program Terms

During the Program, Kalshi will issue to all Eligible Participants monthly rebate adjustments in the form of outward payments of U.S. dollars credited to the Eligible Participants' accounts ("Rebates") of 98~~100~~% of all net "taker" and 100% of all net "maker" fees derived from trades in Eligible Markets, such that Eligible Participants who have paid fees in Eligible Markets shall receive repayment therefor. Kalshi may convert Rebates to a daily cadence upon exchange notice.

Rebate payments will be calculated at the end of October 2026 and thereafter run per calendar month. The Rebates shall be paid by the 15th of the following month.

5. Interaction with Other Incentive Programs

In the event that an individual transaction is simultaneous eligible for a trading fee Rebate and per-trade incentives across Kalshi's trading incentive programs, Rebates will be reduced by any applicable reduction, rebates, or per-trade incentives earned in the relevant month, such that there will not be double-payment of per-trade incentives for the same trading volume. In other words, Kalshi will adjust payments downwards to the exact extent necessary to prevent trading conditions with net-negative (maker + taker) fees on a per-trade basis.

For example, if the application of Kalshi's Spring 2025 Market Maker Program in conjunction with this Program would lead an Eligible Participants to receive incentive payments for Eligible Markets in excess of their fees paid for Eligible Markets, then Kalshi will adjust the total incentive payments under this Program and the Spring 2025 Market Maker Program to equal the total fees paid for the relevant markets. In other words, Kalshi will adjust payments downwards to the exact extent necessary to prevent trading conditions with net-negative (maker + taker) fees on a per-trade basis.

6. Compliance with Kalshi's Rulebook

All Eligible Participants under this Program are required to adhere to Chapter 5 of Kalshi's Rulebook, including Rule 5.17 (Prohibited Transactions and Activities). Accordingly, any fees paid on transactions resulting from, or subject to inquiry or investigation for potential, self-matching, wash trading, pre-arranged trading, or any other abusive trading practices set forth in Rule 5.17, as well as fees paid on transactions cancelled or price-adjusted in accordance with Kalshi Rule 5.11, shall be excluded from eligibility for Rebates under this Program.

Kalshi may also take additional action to preserve market integrity, including but not limited to, termination or modification of the Program terms, in a manner consistent with CFTC rules and regulations, termination of Eligible Participant status under the Program in accordance with Section 6 below, or commencement of disciplinary procedures under Chapter 9 of the Kalshi Rulebook.

7. Monitoring and Termination of Status:

Kalshi shall monitor trading activity and participants' performance and shall retain the right to revoke participant status if Kalshi's Chief Regulatory Officer or Chief Compliance Officer concludes from review that a participant's participation in the program is abusive or in any way inconsistent with the purpose of the Program.

In the event of such a determination, Kalshi will implement the following procedures:

- Kalshi shall document the termination of Eligible Participant status under the Program;
- Kalshi shall notify the participant in writing that the participant is no longer eligible to receive incentives under the Program; and
- Upon any effective termination date, any incentives earned for periods ending before the effective termination date will remain earned, except in cases of fraud, willful misconduct, or violation of the Exchange Rulebook.

Kalshi shall keep a record of the operation of this program, and may modify or terminate the Program at any time, in a manner consistent with CFTC rules and regulations.

Appendix B
Temporary Perpetual Fee Rebate Program ("Program")
Terms and Conditions (Clean)

1. Program Purpose

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